

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD ROSARIO,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

18-cv-4023 (LGS)

DECLARATION OF ANNA BENVENUTTI HOFFMANN

I, ANNA BENVENUTTI HOFFMANN, an attorney admitted to practice in the State of New York and the Southern District of New York, submit this declaration under penalty of perjury:

1. I am a partner at the firm Neufeld Scheck & Brustin, LLP (“NSB”), with offices at 99 Hudson Street, 8th Floor, New York, New York 10013.

2. I make this declaration in support of an application for attorneys’ fees pursuant to 42 U.S.C. § 1988, covering the hours I expended on this matter. I am fully familiar with the facts discussed herein.

EDUCATION AND EXPERIENCE

3. In 2004, I graduated from New York University School of Law, magna cum laude and Order of the Coif. Upon graduation I was awarded the Law Review Alumni Association Award for graduating third in my class as well as the Benjamin F. Butler Memorial Award for “unusual distinction in scholarship, character and professional activities.” I served as a law clerk to the now late Honorable Reginald C. Lindsay of United States District Court for the District of

Massachusetts in the 2005–2006 term. During the summer of 2005, I worked as an associate at NSB. Upon finishing my clerkship in August 2006, I returned to NSB, where I have worked ever since; I became a partner in 2013. My resume is attached as Exhibit A.

4. Throughout my time at NSB my practice has been devoted exclusively to complex civil rights cases, focusing on § 1983 wrongful conviction suits. My practice focuses specifically on wrongful conviction and malicious prosecution cases like Richard Rosario's: lawsuits against police, prosecutors and/or state and municipal crime lab employees for fabricating evidence, withholding exculpatory evidence, and the like. This relatively new and constantly evolving body of law—arising at the intersection of criminal procedure and civil rights—consists of constitutional claims with very high burdens of proof, as well as complex immunity doctrines. To my knowledge, NSB is the only firm in the nation litigating these issues full-time.

5. All of these cases involve potential defenses of absolute and qualified immunity, and most require a nuanced understanding of the differences between what it takes to vacate a criminal conviction and what it takes to prove civil liability. Seventeen years of experience with these issues, along with my access to NSB's collective knowledge, made my work on this case much more efficient than it otherwise would have been.

6. During my time at NSB I have contributed to dozens of significant settlements, verdicts, and appellate victories in such cases around the country. For example, I was co-lead trial counsel (with Nick Brustin) in the wrongful conviction suit on behalf of exonerees John Restivo and Dennis Halstead; I then wrote and argued the appeal preserving the full \$43 million judgment (including interest, costs and attorney's fees). *Restivo v. Hessemann*, 846 F.3d 547 (2d Cir. 2017). In 2018, I was also co-lead trial counsel (with Nick Brustin) in the wrongful conviction suit on behalf of Jamal Trulove, which resulted in a \$10 million jury verdict and an additional \$4.5 million

award of costs and fees. *Trulove v. D'Amico*, No. 16-cv-00050 (N.D. Cal.).

7. My work at NSB over the past 17 years has contributed to many other notable successes including *Deskovic v. City of Peekskill, et al.*, No. 07-CV-8150 (S.D.N.Y.) (over \$23 million in total settlements for wrongful conviction suit); *Coley v. Simi Valley* (C.D. Cal.) (\$21 million settlement for wrongfully convicted plaintiff who served 39 years in prison for murders of a woman and her 4-year-old son); *Register v. City of Los Angeles*, No. 14-CV-0568 (C.D. Cal.) (\$16.7 million settlement for wrongfully convicted plaintiff who served 34 years in prison for robbery and murder based on witnesses' false identification); *Gates v. District of Columbia*, No. 1:11-cv-00040 (D.D.C.) (jury found that District of Columbia police officers had fabricated evidence and hid exculpatory evidence during plaintiff's trial for rape and murder, resulting in 28-year wrongful conviction, with the government settling claims for \$16.65 million while jury was deliberating on damages); *Bivens v. Forrest County*, No. 13-CV-8 (S.D. Miss. 2016) (\$16.5 million settlement to the estates of three African-American men coerced into falsely confessing to the 1979 rape and murder of a white woman); *Saunders v. City of Chicago*, 12-cv-09158 (N.D. Ill.) (\$15.99 million total settlements for § 1983 wrongful conviction suit); *Berry v. Las Vegas Metro. Police Dep't*, 19-cv-640 (D. Nev.) (\$14.5 million settlement in § 1983 wrongful conviction suit); *Wilson v. City of New York*, No. 15-cv-4156 (E.D.N.Y.) (\$13 million settlement in § 1983 wrongful conviction suit); *Halsey v. Pfeiffer*, 750 F.3d 273 (3rd Cir. 2014) (settlement of \$12.5 million after a Third Circuit decision permitting wrongly convicted plaintiff to proceed to trial on § 1983 claims based on fabrication of evidence, malicious prosecution, and coercion); *McIntyre v. Unified Government*, No. 18-cv-2545 (D. Kan.) (\$12.5 million settlement in § 1983 wrongful conviction suit); *Mellen v. City of Los Angeles*, No. CV15-03006 (C.D. Cal.) (\$12 million settlement for wrongfully convicted plaintiff who served 17 years in prison for murder based on *Brady* violation);

Fernandez v. City of New York, No. 1:20-cv-10498 (S.D.N.Y.) (\$12 million settlement in § 1983 wrongful suit); *Tapp v. City of Idaho Falls*, No. 4:20-cv-00476 (D. Idaho) (\$11.7 million settlement for wrongfully convicted plaintiff who served 20 years in prison for murder and was cleared by DNA evidence); *Barr v. Kachiroubas*, No. 1:12-cv-08327 (N.D. Ill.) (\$10 million settlement in § 1983 wrongful conviction suit); *Gibbs v. City of New York, et al.*, No. 06-CV-5112 (E.D.N.Y.) (\$9.9 million settlement in § 1983 wrongful conviction suit); *Wright v. City of Philadelphia*, No. 16-cv-5020 (E.D. Pa.) (\$9.8 million settlement in § 1983 wrongful conviction suit); *Gonzalez v. City of Waukegan*, No. 16-2906 (N.D. Ill.) (\$9.5 million settlement in § 1983 wrongful conviction suit); *Ruiz v. City of New York* (S.D.N.Y.) (\$8.99 million pre-filing settlement in § 1983 wrongful conviction suit); *Weeks v. City of New York*, NYC Comptroller Claim No. 2019P1035602 (E.D.N.Y.) (\$8.3 million in § 1983 wrongful conviction suit); *Counts v. City of New York*, NYC Comptroller Claim No. 2018P1023022 (\$8.246 million pre-filing settlement in § 1983 wrongful conviction suit); *Bryant v. Baltimore Police Department*, No. 1:19-cv-00384 (D. Md.) (\$8 million settlement for plaintiff who spent 17 years wrongfully incarcerated before DNA exoneration as a result of police suppression of exculpatory evidence); *Garcia v. City of New York*, No. 08-CV-04274 (S.D.N.Y.) and *Morillo v. City of New York* (separate \$7.5 million settlements for two § 1983 wrongful conviction plaintiffs); *Sanford v. City of Detroit*, No. 17-cv-13062 (E.D. Mich.) (\$7.5 million settlement for innocent plaintiff who spent 8 years in prison for quadruple murder, due to police fabrication of evidence).

8. Through my work at NSB I have litigated wrongful conviction cases in federal and state trial and appellate courts throughout the country, including in 23 states and the District of Columbia. This includes litigation in districts within all twelve of the geographically defined federal circuits. In addition to the many cases in which I have appeared as counsel, I regularly

consult or assist within NSB with any substantial legal question or complicated briefing or writing assignment that arises.

9. I also head NSB's appellate practice. In addition to the *Restivo* case described above, in which I briefed and argued the successful defense of our wrongful conviction verdict on appeal at the Second Circuit and briefed the successful opposition to Defendants' petition for certiorari to the United States Supreme Court, I have briefed and argued two other § 1983 wrongful conviction appeals that led to published decisions, *Mellen v. Winn*, 900 F.3d 1085 (9th Cir. 2018), and *Roberts v. City of Fairbanks*, 947 F.3d 1191 (9th Cir. 2020). I have also briefed other appeals in § 1983 wrongful conviction suits that led to favorable unpublished decisions, including *Hill v. New Orleans City*, 643 Fed. Appx. 332 (5th Cir. 2016), and *Hill v. Gressert*, 705 Fed. Appx. 219 (5th Cir. 2017) (both of which I also argued); *Sanford v. City of Detroit, Michigan*, 815 Fed. Appx. 856 (6th Cir. 2020); and *Howard v. Dowdy*, No. 20-2114, 2021 WL 1529288 (4th Cir. Jan. 27, 2021). I also supervised briefing in *Fogle v. Sokol*, 957 F.3d 148 (3d Cir. 2020), and took the lead for NSB on the briefing in *Halsey v. Pfeiffer*, 750 F.3d 273 (3rd Cir. 2014).

10. Due to my recognized expertise in this area, I am regularly consulted by other civil rights lawyers around the country for assistance on complicated legal issues related to civil rights litigation in general and § 1983 wrongful conviction suits in particular. I have also been consulted as a subject matter expert by lawyers handling several recent Supreme Court arguments in § 1983 suits related to criminal prosecutions, including *Manuel v. City of Joliet*, 580 U.S. 357 (2017), *McDonough v. Smith*, 139 S. Ct. 2149 (2019) and *Thompson v. Clark*, 142 S. Ct. 1332 (2022). Although civil rights litigation is almost always compensated through contingency agreements, I have on occasion been hired and paid by the hour to consult on § 1983 wrongful conviction litigation. Most recently, in 2018, I was paid \$800 per hour for such consulting work.

11. In addition, in 2015 NSB represented a client in a civil rights suit who paid us by the hour for the litigation. The hourly rate I was paid for that work was \$550; in addition, NSB was entitled to a percentage of recovery contingent on litigation success. My partner Nick Brustin was compensated by that client at \$650 per hour, more senior partners at \$750 per hour, and associates at \$300 to \$350 an hour—all in addition to the contingent percentage.

12. Because most of our cases settle, I have rarely had to litigate fee petitions. In the *Restivo* litigation, based on 2014 rates (when I was 10 years out of law school and had only recently been made a partner) I was awarded an hourly rate of \$500. In the *Trulove* litigation, after reviewing our contemporaneous time records and requested rates, defendants stipulated that we were entitled to \$4.5 million in fees and costs, nearly the full amount we requested. My requested 2018 rate was \$650 per hour. Fifteen years ago, in 2007, when I was only a third-year associate after another successful § 1983 wrongful conviction trial in the Central District of California on behalf of Herman Atkins I was awarded a rate of \$300 per hour; in that case the senior partner was awarded \$675 per hour and a junior partner \$400 per hour.

13. Through my work at NSB, I have also developed an expertise in federal civil procedure, especially as it relates to litigating § 1983 suits in federal court. I co-authored a chapter in *Sword and Shield: A Practical Approach to Section 1983 Litigation, Fourth Edition* entitled “Procedural Guide to Section 1983 Litigation in Federal Court.” I was also an active participant in the Duke Law Center for Judicial Studies conference and working group on the 2015 amendments to the Federal Rules of Civil Procedure that produced its “Guidelines and Practices” on the proportionality amendments. I have also taught continuing legal education on federal civil discovery, as well as on aspects of § 1983 police misconduct litigation and strategy, at seminars put on by groups including the American Bar Association, the Practising Law Institute, the

International Municipal Lawyers Association, and the National Police Accountability Project.

14. Since 2006 I have been a member of the National Police Accountability Project, a national association of lawyers representing plaintiffs in police misconduct litigation; since 2014 I have been on NPAP's board and since 2018 I have been on the executive committee. Among other things, through my involvement at NPAP I have written or assisted on amicus briefs on key issues in police misconduct litigation at the Supreme Court and other appellate courts.

15. I was named as Super Lawyer Rising Star from 2014 to 2018, and as a Super Lawyer each year from 2019 to 2022.

16. On behalf of Plaintiff, I am seeking compensation for my work at a rate of \$800 an hour. In my opinion, this requested rate is reasonable in light of the relevant market and my experience and skill.

WORK IN THIS CASE

17. I am seeking compensation, on behalf of Plaintiff, for the time I spent on this matter from October 2018 to October 2022.

18. Over the years of this litigation, I have played a primary role in all substantive briefing, either drafting it myself or editing it. That included opposing Defendants' motion to dismiss, opposing Defendants' motion for summary judgment, and opposing Defendants' *Daubert* motions. Plaintiffs were ultimately successful at each of these stages. I also supervised all pretrial briefing, including our motions *in limine* and our response to Defendants' motions *in limine*, and the jury instructions.

19. Because my practice at NSB has focused on substantive legal research and writing in § 1983 wrongful conviction suits around the country, I have developed an expertise in this area. It is often most efficient for me to research and brief issues myself rather than have a junior attorney

do the first draft. In other cases, I have supervised junior attorneys or legal interns in their research and edited their work.

20. I also was a member of the trial team for this case, which included assisting with legal and trial strategy, assisting in the preparation of opening and closing statements, assisting in preparing witnesses and drafting outlines for witness examinations, supervising and/or drafting all trial briefing, researching legal issues that arose at trial, and handling most legal arguments for Plaintiff at trial including the charge conference.

21. As set forth in the billing records attached as Exhibit B, Chart 1, which come from contemporaneously kept timekeeping logs, I am seeking compensation for a total of 739.9 attorney hours in this matter, excluding work on this fee application.

22. I have reviewed the attached billing record in its entirety, and made an effort to take a conservative and reasonable approach to the total hours for which I seek compensation. In my judgment, each hour set forth in Exhibit B, Chart 1, was necessitated by the circumstances and reasonably expended in pursuit of the ultimate favorable outcome in this complicated and important civil rights case.

WORK ON THE FEE APPLICATION

23. I am also seeking compensation for the time I spent on the § 1988 fee application in this case.

24. I have played a substantial role in the preparation of this fee petition, reviewing all submitted hours myself, supervising the preparation of the supporting affidavits, and editing the memorandum of law in support of our request.

25. I reviewed the contemporaneous time records of each attorney, paralegal and law clerk for accuracy, eliminating any hours that in hindsight were not necessary to the successful prosecution of this case.

26. As set forth in the billing records attached as Exhibit B, Chart 2, which come from contemporaneously kept timekeeping logs, I am seeking compensation for a total of 45.7 hours on the fee application.

27. In my judgment, each hour set forth in Exhibit B, Chart 2 was necessitated by the circumstances and reasonably expended in pursuit of the ultimate favorable outcome in this complicated and important civil rights case.

28. I hereby declare under penalty of perjury that the foregoing is true.

Date: October 7, 2022
New York, NY


ANNA BENVENUTTI HOFFMANN

EXHIBIT A

ANNA BENVENUTTI HOFFMANN

Admissions: NY, MA; SDNY, EDNY, WDNy, D. Mass
D.C., 2d, 3d, 4th, 5th, 6th, 9th, 10th Cir.; and U.S. Supreme Court

EXPERIENCE

NEUFELD SCHECK & BRUSTIN, LLP, New York, NY *Associate* 2006–2012; *Partner* 2013–present
Represent plaintiffs in post-exoneration § 1983 civil-rights actions for wrongful conviction as well as serious police brutality cases, in federal and state courts around the country. Manage cases through all stages of litigation, from filing of complaint through discovery, depositions, substantive briefing, trial, and appeal. Navigate complex questions of constitutional tort law, including intersection of criminal procedure and civil rights, absolute and qualified immunity, and *Monell* liability for systemic misconduct by police, lab personnel and/or prosecutors.

Notable successes include: *Restivo v. Nassau County* (\$36 million jury verdict in § 1983 wrongful conviction suit for 2 exonerees), *aff'd sub nom Restivo v. Hessemann*, 846 F.3d 547 (2d Cir. 2017); *Mellen v. Winn*, 900 F.3d 1085 (9th Cir. 2018) (obtained appellate reversal of summary judgment grant in § 1983 *Brady* suit, leading to \$12 million settlement); *Trulove v. D'Amico* (\$10 million jury verdict in § 1983 wrongful conviction suit); *Bivens v. Forrest County* (\$16.5 million wrongful conviction settlement); *Register v. LA* (\$16.7 million § 1983 wrongful conviction settlement); *Coley v. Simi Valley* (\$21 million settlement in § 1983 wrongful conviction suit); *Saunders v. City of Chicago* (\$15.9 million § 1983 wrongful conviction settlement); *Deskovic v. Peekskill et al* (\$23.75 million total in settlements for 16 years' wrongful incarceration).

THE HON. REGINALD C. LINDSAY, DISTRICT OF MASSACHUSETTS, Boston, MA *Law Clerk* 2005–2006

EDUCATION

NEW YORK UNIVERSITY SCHOOL OF LAW, New York, NY

J.D., *magna cum laude*, May 2004, Order of the Coif

Honors: *Law Review* Alumni Association Award (graduated #3 in class), Butler Scholar, Dean's Scholar, Butler Memorial Award (unusual distinction in scholarship, character & professional activities)

Activities: *Annual Survey of American Law*, Articles Editor; TA, Prof. Mark Geistfeld, Torts

Internships: CPCS-Public Defender Division (Cambridge, MA Fall 2004); Equal Justice Initiative (Montgomery, AL, Fall 2003); Legal Aid Society Criminal Defense Division (NY, NY, Summer 2003); Innocence Project (NY, NY, Summer 2002)

HARVARD COLLEGE, Cambridge, MA

A.B. in Government, *cum laude*, June 2000

Honors: John Harvard and Elizabeth Cary Agassiz Scholarships

PUBLICATIONS, PRESENTATIONS & COMMUNITY MEMBERSHIPS

PLI CLE, *38th Annual § 1983 Civil Rights Litigation: Municipal Liability Update* (Oct. 2021)

IMLA CLE, *§ 1983: Police Officer Misconduct Litigation* (Apr. 2021)

NPAP CLE, *Litigating § 1983 Wrongful Conviction Cases* (Mar. 2017)

ABA CLE, *Police Civil Rights Litigation: From Ferguson to Dallas and Beyond* (Jan. 2017)

Duke Law Conf., *Guidelines and Practices for Implementing the 2015 Discovery Amends.* (2015)

ABA CLE, *§ 1983 Civil Rights Cases Against Police After Ferguson* (May 2015)

Procedural Guide to § 1983 Litigation in Federal Court, in *SWORD AND SHIELD: A PRACTICAL APPROACH TO SECTION 1983 LITIGATION*, with Alexandra Lampert (2015)

Duke Law Conf., *Implementing Discovery Proportionality Standard* (Nov. 2014)

National Police Accountability Project, Member (2006–present), Board Member (2014–present), Executive Committee Member (2018–present)

Hofstra Law School CLE, *Proposed Federal Discovery Changes* (Feb. 2014)

NPAP CLE, *Litigating § 1983 wrongful conviction claims* (Jan. 2011)

EXHIBIT B

CHART 1
SUBSTANTIVE HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
22-Oct-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Meet w/ EF, RS re: case strategy	0:12	0.2
25-Oct-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ rick, discuss response to prefilng MTD letter	0:18	0.3
25-Oct-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review complaint	0:42	0.7
26-Oct-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review/edit premotion MTD letter response, discuss w/ rick, research for motion	2:06	2.1
29-Oct-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review, research, edit pre motion MTD letter	1:36	1.6
7-Nov-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review new 2nd circuit case on mal pros, discuss w/ rick, nick, research	1:12	1.2
14-Dec-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ rick, discuss MTD opp	0:12	0.2
17-Dec-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ rick, discuss opp to MTD	0:48	0.8
17-Dec-18	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review MTD	0:42	0.7
2-Jan-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	talk to rick re: MTD brief	0:24	0.4
3-Jan-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review MTD opp brief	1:30	1.5
6-Jan-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft/edit opp to MTD, then discuss w/ Rick	4:30	4.5
11-Jan-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review draft MTD opp, research for opp	2:24	2.4
12-Jan-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	edit MTD opp brief	6:24	6.4
14-Jan-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review opposition to MTD	5:18	5.3
9-May-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Meet w/ RS re: expert report	0:18	0.3
23-Aug-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review neuropsych expert report	0:24	0.4
6-Sep-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review defense psych expert reports	0:30	0.5
6-Sep-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ nick, len, rick, ali talk to dr agharkar & neuropsych re: rebuttal reports	0:48	0.8
7-Oct-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review MTD decision	0:24	0.4
30-Oct-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	review defs pre motion letter, then discuss w/ rick & emma	0:24	0.4
4-Nov-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	edit premotion SJ letter	2:54	2.9
5-Nov-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	edit premotion SJ letter	2:00	2
4-Dec-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ emma, rick, bettina, avi, ali discuss SJ plan	0:48	0.8
18-Dec-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ nick, emma, rick, avi, ali discuss SJ opp	0:54	0.9
18-Dec-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review dep digests for SJ opp	0:54	0.9
19-Dec-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review dep digests for SJ opp	3:06	3.1
20-Dec-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review dep digests for SJ opp	0:42	0.7
20-Dec-19	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ nick, rick, avi discuss SJ opp	2:30	2.5
10-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review Defs SJ motion	0:30	0.5
13-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ nick, emma, bettina, avi, rick, ali discuss SJ opp	0:48	0.8
13-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review draft fact statement	1:48	1.8

16-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review SJ facts draft	1:12	1.2
16-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ nick, emma, avi, rick, ali discuss SJ facts	1:00	1
21-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review letter for additional pages, then discuss edits w/ rick and avi	0:36	0.6
22-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review draft motion for more pages, discuss edits w/ avi, then rick	0:18	0.3
27-Jan-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ rick, bettina, avi, ali discuss SJ opp	0:48	0.8
4-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Meet w/ RS re: assignments	0:12	0.2
7-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	discuss SJ plan w/ bettina, rick, avi, ali	0:48	0.8
7-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review Def briefs, draft responsive 56.1 statement	3:42	3.7
10-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft SJ opp facts	6:36	6.6
10-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ rick, avi, bettina, at times nick, emma discuss SJ opp	1:36	1.6
10-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Meet w/ rick re: MSJ opp	0:12	0.2
11-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft SJ facts	7:48	7.8
12-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft SJ opp facts	11:36	11.6
13-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft SJ facts	8:48	8.8
14-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft SJ opp	10:00	10
15-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft SJ opp	8:54	8.9
16-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft SJ opp	7:42	7.7
17-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	drat/edit SJ opp	9:12	9.2
18-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft/edit SJ opp	10:36	10.6
19-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	edit SJ opp	9:54	9.9
20-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft/edit SJ opp	12:06	12.1
21-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	draft/edit SJ opp	3:24	3.4
28-Feb-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review edits to MTD opp brief	2:18	2.3
9-Apr-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review SJ reply brief	1:18	1.3
10-Apr-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review SJ briefing	3:06	3.1
14-Apr-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review/edit draft email to brachah, send research to rick	0:54	0.9
16-Apr-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Phone call w/ EF & RS re: SJ reply	0:18	0.3
17-Apr-20	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	talk to emma, rick re: response to brachah	0:24	0.4
20-Jan-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	read SJ decision	0:30	0.5
21-Jan-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	talk to nick/emma re: daubert plan	0:24	0.4
21-Jan-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review expert reports for daubert motions	1:00	1
22-Jan-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review expert reports for Daubert motions	3:24	3.4
22-Jan-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, katie haas, kayla, talk to chip re: Strategy	0:30	0.5
22-Jan-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ nick, emma, rick, katie haas discuss daubert motions, pre-motion letters	0:18	0.3
5-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ emma, talk to bettina re: Pretrial schedule	0:30	0.5
9-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	talk to bettina re: daubert brief, review relevant materials	0:42	0.7

11-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review for prior daubert briefing examples for bettina	0:30	0.5
12-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, katie H., amelia, Talk to chris ritter and arif re: Jury consulting	0:30	0.5
18-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review cases re: daubert brief	0:24	0.4
18-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	talk to bettina re: daubert motion	0:18	0.3
18-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ nick, emma, bettina, katie h, kayla discuss trial prep	1:00	1
24-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ emma and nick discuss prep for status conference re: trial procedure	0:24	0.4
25-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	Telephonic court appearance w/ nick, katie haas, kayla	0:48	0.8
25-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, amelia, katie h. Talk to jury consultant re voir dire	1:00	1
26-Feb-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	talk to katie h and kayla re: pretrial filing requirements	0:18	0.3
1-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ emma and bettina, then just emma discuss pretrial briefing requirement, plan	0:42	0.7
3-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Research for/edit Daubert brief re: Psych experts	4:18	4.3
4-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit/research for daubert re: Pscyh experts	2:24	2.4
5-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Draft/edit daubert brief re: Psych experts	5:18	5.3
8-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	email team re: finalizing daubert motion	0:30	0.5
9-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review defendants' daubert motion	0:48	0.8
9-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	research for daubert opp, email katie	0:54	0.9
9-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, bettina, emma, katie h, kayla discuss response to daubert brief re agharkar	0:24	0.4
9-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ bettina, kayla talk to dr. agharkar re:	0:18	0.3
9-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ nick, emma, kayla, katie m., katie h. discuss daubert opp re: dysart	0:24	0.4
10-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	research for jury instructions	0:18	0.3
12-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ emma, bettina, katie H, kate f, anna a discuss Rosario MILs	0:42	0.7
16-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	talk to katie re: dysart daubert response	0:30	0.5
17-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Edit draft daubert opp motion	4:12	4.2
19-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Edit opp daubert motion	9:54	9.9
21-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Edit opp to daubert motion	1:18	1.3
22-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review daubert opposition motions	0:12	0.2
23-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review defendants' opposition to motion limit psych experts	0:24	0.4
23-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ emma, katie h, kayla talk to brachah re: MILs, pretrial filings	0:42	0.7
24-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ bettina, katie h, kayla discuss reply on motion to limit defendants' psych experts	0:24	0.4
30-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit Daubert reply	3:30	3.5

31-Mar-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, katie h, yasmin meet w/ jury consultants re: Motion for jury questionnaire	0:30	0.5
5-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	email team re: pretrial briefing	0:30	0.5
6-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review draft jury instructions, email katie h.	0:42	0.7
8-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Talk to kate re: Jury questionnaire motion	0:18	0.3
9-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit jury instructions	2:00	2
9-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, katie h discuss draft jury instructions	0:42	0.7
13-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Review draft MILs, research, email edits to Kate F.	1:36	1.6
14-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review draft jury instructions, send edits	0:24	0.4
16-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ emma, talk to katie h re: MILs	0:48	0.8
19-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ nick, emma, katie h, yasmin, jahne, kayla discuss draft jury questionnaire	1:30	1.5
20-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review draft MILs	0:30	0.5
21-Apr-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit draft MILs	0:48	0.8
13-May-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review daubert ruling	0:12	0.2
10-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Discuss MIL plan w/ nick, emma, katie h, kayla	0:42	0.7
15-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit MIL drafts	2:42	2.7
15-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ christina, katie h. Discuss MIL plan	0:24	0.4
16-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Draft/edit MILs	7:24	7.4
21-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, emma, katie h, christina, kayla discuss MIL opp	0:48	0.8
22-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Talk to nick, emma re: MILs	0:24	0.4
23-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Edit MILs	1:54	1.9
23-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Talk to emma, katie h. Re; MIL responses	0:12	0.2
24-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit MILs	0:54	0.9
25-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review Defendants' MIL	0:24	0.4
25-Jun-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ emma, christina, katie h, bianca, rhianna discuss MIL opp	0:42	0.7
7-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ emma, katie h discuss MIL re: Vacated robbery conviction	0:12	0.2
7-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit MIL opp	0:36	0.6
8-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Discuss MIL response w/ Christina	0:24	0.4
8-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Draft/edit MIL response	6:54	6.9
9-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Draft/review MIL response	2:48	2.8
12-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Talk to nick, emma, re: MIL strategy	0:12	0.2
12-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Draft MIL response	2:48	2.8
13-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Draft/edit MIL response	3:48	3.8
13-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, emma discuss edits to MIL opposition	0:30	0.5
14-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review MIL response	0:24	0.4
15-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review defendants MIL response, email team re: strategy	0:36	0.6

19-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ emma, katie h discuss plan for pretrial briefing	0:12	0.2
26-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review robbery MIL	1:12	1.2
26-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Talk to katie haas re: Edits to robbery conviction MIL	0:24	0.4
28-Jul-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit robbery MIL	1:48	1.8
25-Aug-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review defendants' pretrial filings	0:30	0.5
25-Aug-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ emma, katie h discuss pretrial filings	0:30	0.5
26-Aug-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review defendants' proposed edits to jury instructions, pretrial memo	3:42	3.7
26-Aug-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Meet w/ katie h and jury consultants on jury questionnaire, then talk to katie h/ email her resources for questionnaire and jury charge	0:54	0.9
27-Aug-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Talk to Katie h re: response re jury charge, pretrial motion	0:42	0.7
8-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review draft response to pretrial brief	0:42	0.7
9-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit draft response to pretrial brief, response re: Jury charge	1:48	1.8
10-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit opposition to pretrial memo	3:36	3.6
13-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review edits to pretrial brief, case emails	0:18	0.3
13-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	talk to emma re: JPTO filings	0:18	0.3
13-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review draft stips and JPTO, at times discuss w/ nick, emma	0:54	0.9
15-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Prep for jury charge meet and confer	1:30	1.5
15-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Meet and confer re: Jury charge w/ katie h, brachah	1:42	1.7
15-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	Reserach, email opp counsel re: Jury instructions	0:18	0.3
16-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review draft declaration re: Jury questionnaire	0:36	0.6
16-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, katie h, emma discuss jury questionnaire, verdict sheet	0:30	0.5
16-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	legal research re: verdict form, email team	0:24	0.4
17-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit jury questionnaire motion	1:42	1.7
17-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Talk to katie h re: Edits to jury questionnaire motion	0:18	0.3
17-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review clint's declaration in support of jury questionnaire, edit, discuss edits w/ katie h	0:24	0.4
20-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	email opposing counsel, consult w/ team re: pretrial deadlines	0:24	0.4
23-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ brachah and katie h. Discuss pretrial filing, schedule	0:18	0.3
24-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review/edit premotion letter re: Jury questionnaire	0:42	0.7
27-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review defense proposed voir dire	0:06	0.1
28-Sep-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ nick, emma, kayla, katie h discuss voir dire questions	0:42	0.7
6-Oct-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review jury instructions, at times discuss w/ emma, katie h	4:54	4.9
6-Oct-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Discuss jury instructions w/ nick, emma, katie h, kayla	0:18	0.3

22-Nov-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	0:36	0.6
23-Nov-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review MIL rulings, discuss w/ Katie h	0:18	0.3
1-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	0:54	0.9
2-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, katie h, kayla discuss trial prep	0:12	0.2
6-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	W/ nick, emma, katie h, kayla telephonic court conference re: Trial	1:06	1.1
6-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	talk to emma, nick re: trial prep	0:24	0.4
6-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ nick, katie h, emma, kayla discuss trial prep	0:42	0.7
6-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	Research/review for motion to extend trial time	1:54	1.9
7-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ emma, nick, katie h, kayla review trial exhibits	3:30	3.5
7-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	Research for motion on time limits at trial	2:12	2.2
8-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	Research for motion on more time	1:48	1.8
9-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including stipulations	7:30	7.5
9-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, emma, katie h, gerardo, cam discuss trial prep, pretrial filings	1:36	1.6
10-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including stipulations, silverman designations	2:12	2.2
11-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep silverman designations	1:00	1
13-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep silverman designations, review witness outlines, work on opening, motion to reconsider time limits	9:48	9.8
14-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including motion for reconsideration on trial time, review designations,	10:18	10.3
15-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including deposition designations, work on opening, jury instructions, meet to prep for pretrial conference	9:48	9.8
16-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including prep for pretrial conference	7:48	7.8
16-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	Pretrial conference by telephone w/ nick, emma, katie h, gerardo, kayla, cam	2:12	2.2
17-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including review witness outlines, work on opening	7:42	7.7
20-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on pre trial filings, work on opening	8:24	8.4
21-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including objections to dep designations, prep for PTC, work on opening, meet after PTC on trial strategy	7:00	7
21-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	Telephonic court appearance at continued pretrial conference w/ nick, emma, katie h, gerardo, kayla w/ opposing counsel	1:54	1.9
22-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on witness outlines, meet and confer w/ opposing counsel re:	7:48	7.8

23-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including edit pretrial court filings, work on witness outlines	3:48	3.8
27-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on outlines, meeting w/ nick and emma on trial strategy	8:36	8.6
28-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on witness outlines, meet w/ team re: Trial prep, strategy, legal research on filing for court	10:06	10.1
29-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep including talk to team re: trial strategy, work on pretrial filings, communicate w/ opposing counsel, work on witness outlines	5:18	5.3
30-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep including work on filings for court, talk to team re: strategy, work on opening w/ nick/emma	2:48	2.8
31-Dec-21	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on opening, work on witness outlines,	6:54	6.9
4-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Work on witness outlines	0:30	0.5
4-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, katie h, gerardo, kayla, cam discuss next steps	0:30	0.5
5-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, Emma, Katie h, Gerardo, can talk to opp counsel, among ourselves re trial date	0:24	0.4
10-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Call w/ nick, emma, katie h, gerardo, cam, kayla Re trial prep	0:48	0.8
11-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on witness outlines, meet w/ team re: Demonstratives	1:12	1.2
12-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including legal research, work on witness outlines, meet re: Pretrial conference prep, review deposition clips,	3:24	3.4
13-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on witness outlines, work on proposed limiting instructions	6:54	6.9
14-Jan-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on witness outlines, attend telephonic court conference	3:42	3.7
29-Apr-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	talk to emma, then w/ emma to katie re: filing on limiting instructions	0:18	0.3
10-May-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, emma, katie, gerardo, cam, amelia, katie h discuss trial prep	0:36	0.6
10-May-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Talk to nick, emma, amelia re: Trial plan	0:30	0.5
25-May-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, katie h, gerardo, amelia	0:18	0.3
25-May-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	Telephonic court appearance w/ nick, emma, katie h, gerardo	0:42	0.7
31-May-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	review draft jury questionnaire	0:30	0.5
31-May-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ emma, gerardo discuss jury questionnaire	0:18	0.3

6-Jun-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ katie h, emma discuss response to letter re: Robbery investigation	0:12	0.2
14-Jun-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	case team meeting on opening	2:00	2
24-Jun-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	Review letter to court re: Alibi witnesses, send edits	0:12	0.2
11-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Trial prep -- review draft opening, whitaker direct	1:36	1.6
11-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, emma discuss opening, trial prep	1:54	1.9
12-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep, research, talk to emma/nick re strategy	0:42	0.7
13-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep, review outlines, review dep designations, talk to emma re: trial prep	2:42	2.7
13-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Trial prep meeting w/ nick, emma, amelia, gerardo, cam	1:12	1.2
14-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including reviewing deposition designations, talking to emma, talking to nick, emma and gerardo re: Trial prep, emailing opposing counsel	7:30	7.5
15-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep, including review jury charge, review draft witness outlines,	5:00	5
16-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep	0:30	0.5
17-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep	0:42	0.7
18-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on witness outlines, opening, team meetings, meet and confer with defendants	6:48	6.8
19-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep including work on witness outlines, discuss strategy w/ trial team, prep for court conference, telephonic court conference, work on pretrial filings	10:30	10.5
20-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	8:48	8.8
21-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	5:42	5.7
22-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	9:00	9
23-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep	1:30	1.5
24-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	6:12	6.2
25-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	at trial	4:30	4.5
25-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep before/after court	9:24	9.4
26-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	2:48	2.8
26-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	at trial	9:00	9
27-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	8:06	8.1
28-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	8:24	8.4
29-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep	9:48	9.8
30-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	8:42	8.7
31-Jul-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	10:30	10.5
1-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep	3:54	3.9
1-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	in court for trial	9:00	9
2-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	5:48	5.8

2-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	at trial	8:30	8.5
3-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	4:18	4.3
3-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	in court at trial	8:30	8.5
4-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	3:36	3.6
4-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	Trial - being in court	9:00	9
5-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	12:54	12.9
6-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	10:48	10.8
7-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	11:00	11
8-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	6:36	6.6
8-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	at trial	10:00	10
9-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	Trial prep	8:30	8.5
9-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	at trial	9:00	9
10-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Prep	trial prep	3:00	3
10-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	at trial	7:00	7
11-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Court appearance	in court	5:30	5.5

Total	739.9
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CHART 2
FEE PETITION HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
15-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	talk to amelia, gerardo, katie h, cam re: fee application	0:24	0.4
17-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ cam, gerardo, sona discuss fee application	0:36	0.6
18-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	Work on fee petition	0:24	0.4
18-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick talk to chip re: Next steps, strategy	0:18	0.3
19-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	Research for fee petition	1:00	1
22-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	talk to emma re: fee petition	0:12	0.2
23-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	w/ emma, cam, sona discuss fee petition	0:24	0.4
25-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, chip talk to richard re: Next steps	0:24	0.4
26-Aug-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Call re: Fee petition w/ emma, cam, sara	0:18	0.3
8-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ nick, emma, gerardo discuss	0:12	0.2
13-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Review hours for fee petition	5:24	5.4
13-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	w/ gerardo, cam, sona discuss fee petition	0:36	0.6
15-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	Meet w/ lucia re: Fee petition	0:12	0.2
16-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Research	Research for fee petition, work on preparing petition	2:18	2.3
16-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, sona, gerardo, cam discuss fee petition	0:24	0.4
19-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ sona, gerardo, cam discuss fee petition next steps	0:30	0.5
20-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	review/edit affidavits for fee petition	0:18	0.3
20-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ nick, emma, sona, gerardo, cam discuss fee petition, outside affidavits	0:12	0.2
22-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	work on fee petition	1:18	1.3
23-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	work on fee petition	1:30	1.5
23-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Meeting	W/ emma, sona, gerardo, cam discuss prep for fee petition	0:30	0.5
27-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	Work on fee petition	1:00	1
28-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	work on fee petition	0:30	0.5
30-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Review	work on fee petition	0:30	0.5
30-Sep-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	Discuss affidavits, brief in support of fee petition w/ gerardo, sona, emma, at times nick	0:36	0.6
3-Oct-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Miscellaneous	Work on fee petition, including edit brief	5:54	5.9
3-Oct-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ emma, sona, gerardo discuss fee petition issue	0:36	0.6
4-Oct-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	W/ sona, gerardo, cam discuss next steps for fee petition	0:30	0.5
5-Oct-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Review/edit declarations, brief for fee petition	10:42	10.7
5-Oct-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Phone Call	talk to cam/gerardo/sona re: fee petition	0:30	0.5
6-Oct-22	Anna Benvenuti Hoffmann	Rosario (Richard)	Draft	Draft/edit fee petition brief, declarations	7:30	7.5

Total	45.7
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